

UNITED STATES DISTRICT COURT

for the  
Central District of California

In the Matter of the Search of )

(Briefly describe the property to be searched  
or identify the person by name and address) )

A United States Postal Service Priority )  
Mail parcel bearing label number 9505 )  
5143 4863 3027 6199 11 and currently )  
in the custody of the United States )  
Postal Inspection Service )

Case No. 5:23-MJ-00052

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

*See Attachment A*

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

*See Attachment B*

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
21 U.S.C. §§ 841(a)(1), and 843(b)

*Offense Description*  
See attached affidavit

The application is based on these facts:

*See attached Affidavit*

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days: \_\_\_\_\_*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

\_\_\_\_\_  
*Applicant's signature*

USPIS Task Force Officer, Zachary Sumpter

\_\_\_\_\_  
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Judge's signature*

City and state: Riverside, CA

Honorable Kenly Kiya Kato, U.S. Magistrate Judge

\_\_\_\_\_  
*Printed name and title*

AUSA: Abigail W. Evans (951-276-6086)

**AFFIDAVIT**

I, Zachary Sumpter, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of an application for a warrant to search a United States Postal Service ("USPS") Priority Mail parcel currently in the custody of the United States Postal Inspection Service ("USPIS") Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California. The parcel, as described more fully in Attachment A, is a USPS Priority Mail parcel in a brown and blue colored, medium-sized Walmart cardboard box bearing tracking number 9505 5143 4863 3027 6199 11, with a recipient address of "Will Todd, 108 E Due West Ave, Madison TN, 37115" and a return address of "Cindy Smith, 9976 Poulsen Ave, Montclair Ca 91763" (the "SUBJECT PARCEL"). The SUBJECT PARCEL was postmarked on January 27, 2023, in the 91763 ZIP code. Attachment A is incorporated by reference herein.

2. The requested search warrant seeks authorization to seize fruits, instrumentalities, and evidence of violations of Title 21, United States Code, sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility, including the mails, to Facilitate the Distribution of a Controlled Substance), as described more fully in Attachment B. Attachment B is incorporated by reference herein.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

## **II. TRAINING AND EXPERIENCE**

4. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS"), and I have been so employed since November of 2021. I am currently assigned as a Task Force Officer to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations involving the United States Mail. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, section 2510(7); that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department ("CPD"). I have been a sworn law enforcement officer since August 2013. I am a Police Officer within the meaning of section 830.1 of the California Penal

Code. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws, including, but not limited to Title 21, United States Code, sections 841, 846, 952, 959 and 963 and Title 18, United States Code, section 1956(a). I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances and the laundering of drug proceeds.

5. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws, including, but not limited to Title 21, United States Code, sections 841, 846, 952, 959 and 963 and Title 18, United States Code, section 1956(a). I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances and the laundering of drug proceeds.

6. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage,

transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am also familiar with the manner in which narcotics traffickers transport and distribute narcotics in areas they control. I am familiar with how drug traffickers utilize counter-surveillance techniques to avoid detection by law enforcement. I also know that drug traffickers often communicate with their drug-trafficking associates through the use of cellular telephones. I have become aware that more sophisticated drug trafficking networks now utilize the dark web, e-mail, Blackberry devices, Voice over Internet Protocol, video chat, internet messaging services, and social networking sites to communicate with one another. During drug-related communications, traffickers often use coded or cryptic language to disguise the drug-related nature of their conversations.

### **III. STATEMENT OF PROBABLE CAUSE**

#### **Background**

7. As described in detail below, the SUBJECT PARCEL is an outbound parcel to Madison, Tennessee, from Montclair, California, and it was selected for investigation because it met certain criteria consistent with packages containing contraband. The SUBJECT PARCEL is believed to contain controlled substances or the proceeds from the trafficking of controlled substances based on, among other things, positive alerts by a trained narcotics-detection canine.

8. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been

conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

9. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United

States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

10. I also know based on my training and experience that drug traffickers will often use one of two USPS services: Priority Mail Express Service, which is the overnight/next day delivery mail service, and Priority Mail Service, which is the two-to-three day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also allows drug traffickers to track the package's progress to the intended delivery point.

11. Based on information derived and built upon over many years, I, like other Postal Inspectors and Task Force Officers, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

- a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;
- b. The article bears a handwritten label; and/or
- c. The handwritten label on the article does not

contain a business account number.

12. Parcels found to meet these characteristics are scrutinized by Postal Inspectors and Task Force Officers through further investigation, which may include return and addressee address verifications and trained narcotics-detecting canine examinations. Postal Inspectors and Task Force Officers will also look for additional drug or drug proceed parcel characteristics such as:

a. The seams of the article are all taped or glued shut;

b. The article emits the odor of a cleaning agent, adhesive, or spray foam, detectable by a human; and/or

c. Multiple articles are mailed by the same individual, on the same day, from different locations.

13. Based on my training and experiences and information learned during discussions with Postal Inspectors, I know that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

**Investigation Regarding SUBJECT PARCEL**

On January 31, 2023, I was alerted to the SUBJECT PARCEL based on an analysis of USPS business records, which revealed that it was associated with a different parcel, that was seized on January 31, 2023, from the Ontario, California Post Office ("1/31/23 Seized Parcel"). The 1/31/23 Seized Parcel was opened



pursuant to a federal search warrant issued in the Central District of California, case number 5:23-MJ-00035, and was found to contain approximately 3,202 grams of suspected methamphetamine. Upon reviewing USPS records, I learned that the SUBJECT PARCEL was not delivered because the recipient address is unknown, and instead it was designated to be returned to the sender. On February 2, 2023, I intercepted the SUBJECT PARCEL from the Montclair Post Office, 5186 Benito Street, Montclair, California. I have reviewed photographs of the 1/31/23 Seized Parcel, and observed that the handwriting on the 1/31/23 Seized Parcel appears to match the handwriting on the SUBJECT PARCEL.

**Parcel Description and CLEAR Database Check**

14. CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

15. The SUBJECT PARCEL has the listed return and recipient information handwritten on the top of the parcel in black marker and does not contain a business account number. The subject parcel is wrapped in copious amounts of clear tape.

16. According to CLEAR database records, the return address of "9976 Poulsen Ave, Montclair Ca 91763" listed on the SUBJECT PARCEL is not associated with the listed sender "Cindy Smith." Based on a CLEAR database check, the recipient address of "108 E Due West Ave, Madison TN, 37115" listed on the SUBJECT PARCEL is not associated with the listed recipient "Will Todd."

**Positive Canine Alert on the SUBJECT PARCEL**

17. On February 2, 2023, Chino Police Department Officer Angel Bran and his narcotics-detection canine, "Cyra", conducted an exterior examination of the SUBJECT PARCEL. Officer Bran informed me that Cyra gave a positive alert to the SUBJECT PARCEL, indicating the presence of controlled substances or other items that emitted the odor of controlled substances in the SUBJECT PARCEL. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, is an affidavit setting forth information provided by Officer Bran regarding Cyra's training and history in detecting controlled substances and Cyra's investigation of the SUBJECT PARCEL.<sup>1</sup>

**IV. CONCLUSION**

18. Based on the above, I believe there is probable cause to believe that the SUBJECT PARCEL described in Attachment A contains evidence of violations of Title 21, United States Code, sections 841(a)(1) (Possession with Intent to Distribute a ///  
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<sup>1</sup> In his affidavit, Officer Bran listed the ZIP code on the SUBJECT PARCEL as "37115-**5283**." Officer Bran references the ZIP code as printed on the USPS label affixed to the SUBJECT PARCEL when it was dropped off at the post office for mailing. In my description of the SUBJECT PARCEL above and in Attachment A, I have copied exactly the handwritten recipient address on the SUBJECT PARCEL, which did not include the final four digits, "5283."

19. Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility, including the mails, to Facilitate the Distribution of a Controlled Substance).

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this \_\_\_\_ day of  
February 2023.

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UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

PARCEL TO BE SEARCHED

1. The following United States Postal Service Priority Mail parcel seized on February 2, 2023, and currently in the custody of the United States Postal Inspection Service Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California:

a. The SUBJECT PARCEL is a United States Postal Service Priority Mail parcel in a brown and blue colored, medium-sized Walmart cardboard box bearing tracking number 9505 5143 4863 3027 6199 11, with a recipient address of "Will Todd, 108 E Due West Ave, Madison TN, 37115" and a return address of "Cindy Smith, 9976 Poulsen Ave, Montclair Ca 91763". The SUBJECT PARCEL was postmarked on January 27, 2023, in the 91763 ZIP code.

**ATTACHMENT B**

ITEMS TO BE SEIZED

The following are the items to be seized from the SUBJECT PARCEL, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.

# Exhibit 1

## AFFIDAVIT

## HANDLER ANGEL BRAN AND K9 "CYRA"

I, **Officer Angel Bran**, attended the Adlerhorst Police Dog Handler Course in June 2019 with Police Service Dog (PSD) Cyra. I received 240 hours of instruction in basic police dog handling skills. PSD Cyra and I were certified as a patrol team in August 2019. In August 2020, PSD Cyra and I attended the Adlerhorst Police Dog School Drug Detection Class. During this course, PSD Cyra and I receive 240 hours of instruction in the detection of the odor of illegal drugs. In September 2020, PSD Cyra and I passed a certification test in the detection of the odor of illegal drugs. During this course, I personally observed PSD Cyra alert to the presence of the odor of an illegal drug. I am familiar and knowledgeable in the behavior's PSD Cyra engages in when she detects the odor of illegal drugs.

I have been a Peace Officer since 2013 and have been present at hundreds of drug investigations since the start of my career. I have received formal training from the San Bernardino County Sheriff's Department, Chino Police Department and the California Narcotic Officers' Association on drug recognition and symptomology.

I do continual training with PSD Cyra through Adlerhorst International and out in the field during patrol or training sites hosted by different police departments. The training includes various hiding locations including, but not limited to: vehicles, buildings, bags, parcels and open areas. This training also includes proofing PSD Cyra on novel odors such as: plastic, boxes, latex, tape, metal, money (circulated and un-circulated) and food. I also proof PSD Cyra off my human odor. This training is on-going and continual.

On 2-2-23 @ 1500, POSTAL INSPECTOR SUMPTER asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5143 4863 3027 6199 11

Addressed to: 108 E DUE WEST AVE  
MADISON TN 37115-5283

  
K9 Officer Angel Bran ID#3655  
Chino Police Department